

REMARKS

A. Overview

Claims 1, 2, 4, 5, 8, 10, 13-25, 45, 46 and 48-54 are pending in the present application.

This response is an earnest attempt to place the application in form for allowance.

Reconsideration is respectfully requested.

The sole rejection of the claims is on obviousness. Each of those stated rejections will be addressed in the order presented in the Office Action.

B. Obviousness Rejection Based on Taylor U.S. Patent 5,209,560 ("Taylor")

Claims 1 and 45 stand rejected based on Taylor. This rejection is respectfully traversed.

Taylor describes itself as generally pertaining to "stage lighting systems having intelligent remote lighting fixtures and intelligent data distribution networks." Taylor column 1, lines 18-20). Taylor describes its goal as simultaneous control of hundreds of lamp units, theatrical stage lighting context. As indicated at Taylor, Figure 1, and as described in the Taylor specification, use of the term "control console" and "remote control unit" relates to lights that are at, or around, or on-site, the stage. As indicated at Taylor, Figure 1, control console 24 is at or on site the lighting system for the stage. Remote control unit 84 "is a hand-held device which the lighting designer carries onto the stage for use for fine adjustments to the azimuth and elevation of the lamp units, ensuring that the light beam does (or does not) fall on a certain set piece or area of the stage." Taylor column 17, lines 45-50. Control console 82 "could be a director's console, used by the lighting director during rehearsals to display data for cues other than the one currently being performed by the lamp units or to recall cues in the lamp units which the operator is away from the control console 24." Column 17, lines 50-55. Alternative control console 84 "could be

located at a position which gives a appropriate view of the stage for certain types of performances. The provision of this alternative console would prevent the necessity of moving the main control console 24 and its connection to data link 26." Column 18, lines 1-6. Thus, again, the context of "remote" relative to Taylor is simply that the controls of the lights are not proximate to the lights themselves. But the remote devices are not remote in the sense they are off site the stage. As made clear in Taylor, these control consoles or devices are utilized by personnel that are present on-site the stage, such as stage director, lighting director and the like.

Applicants' claimed invention is specifically directed towards an off-site central device that includes a data base of events. A communication link, communicates data from the central off-site device to a remote device connected to a wide area lighting device that is on-site (on-site the area to be lighted). This is in direct contrast to Taylor which has both the lighting system and its control system on site.

As set forth in Applicants' specification, a primary example of off-site central control is the ability to have a schedule of events at a central data base in one town, which communicates to a lighting system in another town to turn those lights on and off according to a schedule. Equipment and personnel at central control are not on site the lighting system being controlled. Applicants' specification specifically teaches the advantage of eliminating the requirement that personnel go on-site the lighting system to turn the lights on and off.

Therefore, it is respectfully submitted Taylor teaches away from Applicant's claims. Therefore it is respectfully submitted that Taylor does not present a *prima facie* case of obviousness of Applicant's claims. Taylor does not teach all material limitations of Applicant's claims in the arrangement of those claims.

To advance prosecution of the application, Applicant has amended claims 1 and 45 to make clearer this distinction. The specification, including Figures 2-7 and their related written description, shows the example of a central control in one location (State C, City 3), and lighting systems in other locations (State A, City 1, City 2, etc.). Claims 1 and 45 specifically clarify the central device is off-site relative to the lighting device or system.

C. Obviousness Rejection Based on Taylor in View of Bell U.S. Patent 5,898,587 ("Bell")

Claims 2, 4-5, 8, 10, 13-25, 46, 48-54 stand rejected as obvious based on a combination of the teachings of Taylor and Bell. These rejections are respectfully traversed.

The primary cited reference Taylor has been discussed above. Its paradigm is centralized but on-site control of stage lights. This teaches away from Applicants' claims, as discussed above.

Bell specifically relates to a system that can enter data about a game in progress that selectively can be used for display on a scoreboard and/or on what they call a display board. Bell defines and describes data entry devices like keyboards (Bell Figure 1) along with interfaces that allow data to be entered into the system that is over and above the data entry options of a traditional arena scoreboard. As can be appreciated, many times data entry for a scoreboard has limited options, e.g., to display score, inning or period, number of time outs, and other limited information about the game. Bell teaches the ability to introduce other data, such as player statistics, player names, upcoming game schedules, and advertisements, on a display board (for example an alpha numeric type board or flat display).

Bell is cited as disclosing a data base related to "a schedule of events" (citing Bell column 3, lines 45-49). However, the schedule is just information for display on site. There is no

teaching of utilizing any type of schedule of events for other than simply display for on-site spectators. In other words, any schedule in Bell does not relate to sending a communication. Rather it is simply information to be displayed on-site.

Therefore, it is respectfully submitted that Bell also does not teach or suggest Applicant's claimed invention. Furthermore, there is no incentive, teaching, or suggestion of combining Taylor and Bell. Taylor is purportedly a better system of controlling the operation of stage lighting. Bell discloses a better way of displaying information at a sporting event. These are apposite concepts.

It is therefore respectfully submitted either Taylor or Bell, or a combination of the two presents a *prima facie* case of obviousness relative to Applicant's claims.

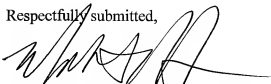
D. Conclusion

It is respectfully submitted all pending claims are allowable over the rejections stated in the Office Action. Favorable action is respectfully requested.

This is a request for a two-month extension of time and authorization is given to charge Deposit Account No. 26-0084 the fee of \$450.00. It is not believed that any further fees or request for extension of time are required for entry of this response but if any has been inadvertently overlooked, please consider this a request therefore and charge any required fee to Deposit Account No. 26-0084.

Reconsideration and allowance is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark D. Hansing', is written over the typed name and firm information.

MARK D. HANSING, Reg. No. 30,643
McKEE, VOORHEES & SEASE, P.L.C.
801 Grand Avenue, Suite 3200
Des Moines, Iowa 50309-2721
Phone No: (515) 288-3667
Fax No: (515) 288-1338
CUSTOMER NO: 22885

Attorneys of Record

- MDH/pw -